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Attorneys for Defendant Pro Tech Machine

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re)	Chapter 11
)	
DPH HOLDINGS CORP., et al.,)	Case No. 05-44481 (RDD)
)	
Debtors.)	Hon. Robert D. Drain
)	
)	

**SUR-REPLY AND JOINDER OF PRO TECH MACHINE IN SUPPORT OF OBJECTIONS TO
THE REORGANIZED DEBTORS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Defendant Pro Tech Machine ("Defendant"), by and through its attorneys, Lambert, Leser, Isackson, Cook & Giunta, P.C., hereby submits this Sur-Reply and Joinder in support of its objection (the "Objection") to the Reorganized Debtors' Motion for Leave to File Amended Complaints (the "Motion").

In the interest of judicial economy, the Defendant will not repeat and restate the arguments advanced by similarly situated parties who have filed Sur-Replies to the Motion. The Defendant joins and adopts all relevant arguments and authorities as if stated fully herein. The Defendant reserves the right to supplement this Sur-Reply, including, but not limited to providing documentary evidence, and to appear at all hearings and conferences scheduled on the Motion.

Respectfully submitted,

LAMBERT, LESER, ISACKSON,
COOK & GIUNTA, P.C.

Dated: June 15, 2011.

By: /s/ Susan M. Cook

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